

**MEMO ENDORSED.**

THE WEINSTEIN GROUP, P.C.

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March 11, 2025

Hon. Ona T. Wang  
US Magistrate Judge  
500 Pearl Street  
New York, New York 10007

Re: Yitzhak, et al. v. Verner, et al.  
Case No.: 1:23-cv-02084

Dear Judge Wang:

Kindly accept this joint letter providing a status of the matter and the efforts of the parties in moving the case forward. We are in receipt of Your Honor's Order from today and are writing requesting a further extension to conduct party depositions and exchange expert's reports.

Over the last 2 months, counsel have been in communication narrowing the paper discovery demanded and exchanging it. On March 3, 2025, Plaintiffs produced discovery responses with supporting exhibits in response to defendants' discovery demand. As recently as March 6, 2025, Plaintiff communicated with Defendant requesting to schedule depositions and urging a status letter to the Court. In response, defendants' counsel requested some time to review the plaintiff production, and shared the identity of the insurance carrier. Defendants have now represented that they need additional time to finish paper discovery in response to plaintiff's production made on March 3, 2025. At this time, paper discovery is not complete, and we have yet to do the party depositions which are essential. In short, counsel have been actively using this time to conduct discovery and move the matter along, but have been remiss in failing to inform the Court of the progress, for which we jointly apologize to Your Honor.

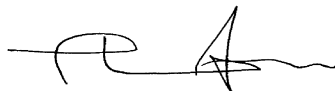
May we jointly ask the Court to reconsider its Order from today and allow a further extension to conduct and conclude discovery in this matter.

Application **GRANTED**. The discovery deadline is hereby **EXTENDED** to **April 3, 2025**. If the parties need any further extensions of discovery, they should be prepared to discuss in detail at the conference what discovery remains outstanding and why.

**SO ORDERED.**

Respectfully,

THE WEINSTEIN GROUP, P.C.



LLOYD J. WEINSTEIN, Esq.



Ona T. Wang  
U.S.M.J. 3/12/2025